

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AIU INSURANCE COMPANY,

X

Plaintiff,

:

07 CIV 7052 (SHS)

— v. —

:

**MOTION TO ADMIT
COUNSEL PRO HAC VICE**

TIG INUSRANCE COMPANY,

:

Defendant.

X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I Sean Keely, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Joelle K. Blomquist, Esq.
Butler Rubin Saltarelli & Boyd LLP
70 West Madison Street, Suite 1800
Chicago, Illinois 60602
Phone: (312) 444-9660
Fax: (312) 444-9287

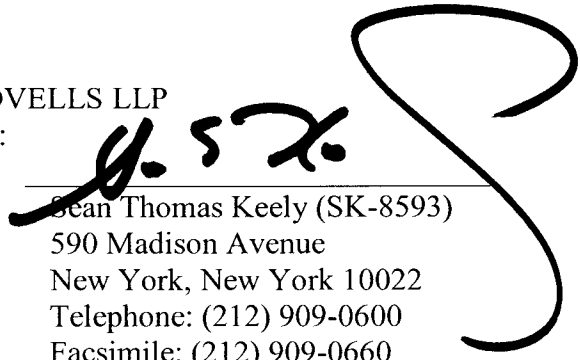
Joelle K. Blomquist is a member in good standing of the Bar of the State of Illinois

There are no pending disciplinary proceedings against Joelle K. Blomquist in any State or Federal Court.

Dated: New York, New York
May 30, 2008

LOVELLS LLP

By:


Sean Thomas Keely (SK-8593)
590 Madison Avenue
New York, New York 10022
Telephone: (212) 909-0600
Facsimile: (212) 909-0660
sean.keely@lovells.com

Counsel for Defendant
TIG Insurance Company

952-743825
MAY 30 2008

FILED
U.S. DISTRICT COURT
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AIU INSURANCE COMPANY,

Plaintiff,

— v. —

TIG INUSRANCE COMPANY,

Defendant.

X

07 CIV 7052 (SHS)

:

**AFFIDAVIT OF SEAN
THOMAS KEELY IN
SUPPORT OF MOTION TO
ADMIT COUNSEL PRO HAC
VICE**

X

STATE OF NEW YORK)

)

ss:

COUNTY OF NEW YORK)

Sean Thomas Keely, being duly sworn, hereby deposes and says as follows:

1. I am Of Counsel with the firm Lovells LLP, counsel for Defendant TIG Insurance Company in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Joelle K. Blomquist as counsel *pro hac vice* to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York and this Court.
3. Joelle K. Blomquist is a member of the firm Butler Rubin Saltarelli & Boyd LLP, and is a member in good standing of the bar of the Supreme Court of Illinois. An original certificate of good standing issued by the clerk of the Supreme Court of Illinois is attached hereto as Exhibit A.
4. I have found Ms. Blomquist to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

5. Accordingly, I am pleased to move the admission of Joelle K. Blomquist, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of Joelle K. Blomquist, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the Court grant the motion to admit Joelle K. Blomquist, to represent Defendant in the above-captioned matter.

SWORN TO BEFORE ME
this 30 day of April, 2008.

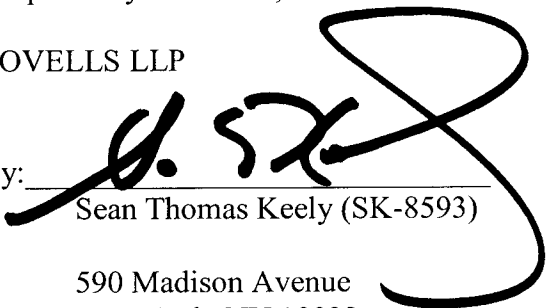


Notary Public

W. BEHRMAN
Notary Public, State of New York
Reg. No. 02BE6132944
Qualified in New York County
Expires Aug. 29, 2009

Respectfully submitted,

LOVELLS LLP

By: 
Sean Thomas Keely (SK-8593)

590 Madison Avenue
New York, NY 10022
Phone: (212) 909-0600
Fax: (212) 909-0660

Attorneys for Defendant TIG Insurance Company

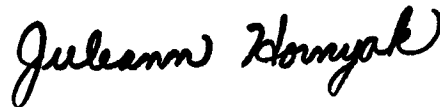
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Joelle Kristen Blomquist

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 10, 2005 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Tuesday, May 27, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AIU INSURANCE COMPANY,	07 CIV 7052 (SHS)
Plaintiff,	:
— v. —	:
TIG INUSRANCE COMPANY,	: ORDER FOR ADMISSION
Defendant.	: <i>PRO HAC VICE</i> ON
	: WRITTEN MOTION
-----	X

Upon the motion of Sean Thomas Keely, attorney for Defendant TIG Insurance Company, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Joelle K. Blomquist, Esq.
Butler Rubin Saltarelli & Boyd LLP
70 West Madison Street, Suite 1800
Chicago, Illinois 60602
Phone: (312) 444-9660
Fax: (312) 444-9287
E-mail: jblomquist@butlerrubin.com

is admitted to practice *pro hac vice* as counsel for Defendant TIG Insurance Company in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: May _____, 2008

United States District Judge

CERTIFICATE OF SERVICE

I am over the age of 18 and not a party to the within action; my business address is:
590 Madison Avenue, New York, New York, 10022.

I hereby certify that on May 30, 2008, I caused a true and correct copy of **Defendant TIG Insurance Company's Motion to Admit Counsel Pro Hac Vice for Joelle K. Blomquist** to be served by hand upon:

William A. Maher, Esq.
Marc L. Abrams, Esq.
WOLLMUTH MAHER & DEUTSCH LLP
500 Fifth Avenue
New York, New York 10110
(212) 382-3300

Executed on May 30, 2008 at New York, New York.

I declare that I am employed in the office of counsel for defendant TIG Insurance Company, at whose direction the service was made.

A handwritten signature in black ink, appearing to read 'Eamon Mason', is written over a horizontal line.

EAMON MASON